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CARL J. KUNASEK
Chairman
JAMES M. IRVIN
Commissioner
WILLIAM A. MUNDEL
Commissioner

IN THE MATTER OF U S WEST
COMMUNICATIONS, INC.'S
STATEMENT OF GENERALLY
AVAILABLE TERMS AND
CONDITIONS

DOCKET NO. T-01051B-99-0068

IN THE MATTER OF U S WEST
COMMUNICATIONS, INC.'S
COMPLIANCE WITH § 271 OF THE
TELECOMMUNICATIONS ACT OF 1996

~~DOCKET NO. T-01051B-99-0068~~

**MOTION FOR LEAVE TO RESPOND TO QWEST'S REVISION CONCERNING
COLLOCATION INTERVALS**

AT&T Communications of the Mountain States, Inc. and TCG Phoenix

("Collectively, AT&T") hereby move for leave to respond to Qwest's revision concerning collocation intervals as described in the recently-submitted Compliance Filing Modifying Qwest's SGAT to Adopt Collocation Provisioning Intervals Set By the FCC ("Compliance Filing"). The grounds in support of this motion are as follows:

1. By way of its Compliance Filing, Qwest asks for Commission approval to modify, under operation of law, the provisions of Qwest's Statement Of Generally Available Terms ("SGAT") pertaining to the time limits for accomplishing physical collocation.

2. The operation-of-law revision sought by Qwest depends on what the law is as to the time limits in question. As to the appropriate time limits, Qwest sets forth its own legal contentions that are based on Qwest's interpretation of two FCC orders.¹

3. Qwest further argues that there exist certain circumstances that will allow Qwest to exceed the time limits prescribed by the FCC.

4. It would be helpful to the Commission if AT&T were permitted an opportunity to file a response to Qwest's proposed SGAT revision, legal contentions, interpretations of FCC orders, and arguments. AT&T's response would assist the Commission in determining the nature and extent of a proper SGAT revision pertaining to the time limits for provisioning of physical collocation. Because many of the arguments are legal in nature, a written filing in response to Qwest's written filing makes more sense than trying to respond to all issues orally during scheduled workshops. The Commission should also allow any other party desiring to respond an opportunity to do so.

5. Due to existing commitments in SGAT and Section 271 proceedings involving Qwest, AT&T requests through and including December 18, 2000, in which to prepare and file its response.

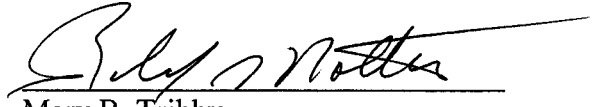
WHEREFORE, AT&T moves that the Commission issue an order (1) that grants leave for AT&T to file, on or before December 18, 2000, a response to Qwest's revision

¹ See *Deployment of Wireline Services Offering Advanced Telecommunications and Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, Order on Reconsideration and Second Further Notice of Proposed Rulemaking in CC Docket No. 98-147 and Fifth Further Notice of Proposed Rulemaking in CC Docket No. 96-98, FCC 00-297 (rel. Aug. 10, 2000) ("Order on Reconsideration" or "Order"), as amended by Memorandum Opinion and Order, FCC 00-2528 (rel. Nov. 7, 2000) ("Amended Order").

concerning collocation, and (2) that allows any other party an opportunity to file a response on or before December 18, 2000.

Dated this 30th day of November 2000.

**AT&T COMMUNICATIONS OF THE
MOUNTAIN STATES, INC.**

By: 
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CERTIFICATE OF SERVICE

I hereby certify that the original and 10 copies of AT&T and TCG Phoenix's Motion For Leave to Respond to Qwest's Revision Concerning Collocation Intervals in Docket Nos. T-01051B-99-0068 and T-00000A-97-0238, were sent via overnight delivery this 30th day of November, 2000, to:

Arizona Corporation Commission
Docket Control – Utilities Division
1200 West Washington Street
Phoenix, AZ 85007

and that a copy of the foregoing was sent via overnight delivery this 30th day of November, 2000 to the following:

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and a true and correct copy of the foregoing was sent via United States Mail, postage prepaid, on the 30th day of November, 2000 to the following:

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